

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2003-327-C

IN RE:)	INTERROGATORIES AND
Continued Availability of Unbundled High)	REQUESTS TO PRODUCE
Capacity Loops at Certain Locations and)	OF MCI WORLDCOM
Unbundled High Capacity Transport on Certain)	COMMUNICATIONS, INC.,
Routes Pursuant to the Federal Communication)	INTERMEDIA COMMUNICATIONS,
Commission's Triennial Review Order)	INC., AND MCIMETRO ACCESS
		TRANSMISSION SERVICES, LLC

INSTRUCTIONS

Please answer each question separately and in the order that it is asked. The numbers of the answers should correspond to the numbers of the Interrogatories being answered. Please copy each question immediately before the answer. Following each answer, please identify the person or persons responsible for the answer and indicate what person or witness provided responsive information or documents, and where applicable, what witness will sponsor each answer in testimony.

In response to Interrogatories seeking the production of documents, please produce all responsive documents for inspection and copying unaltered and/or unredacted as they are kept in the usual course of business and organize and label them to correspond to the categories in this request. If the requested documents are kept in an electronic format, you shall produce the requested document in such format. If any part of a document is responsive to any request, the

whole document is to be produced. If there has been any alteration, modification or addition to a document (whether in paper form or electronic), including any marginal notes, handwritten notes, underlining, date stamps, received stamps, attachments, distribution lists, drafts, revisions or redlines, each such alteration, modification or addition is to be considered as a separate document and it must be produced.

In response to Interrogatories requesting you to identify documents or other items, information or materials for disclosure, please identify the document(s) or other item(s), information or material(s) in sufficient detail so that they can be produced in response to a separate Request for Production. Such identification shall contain the number (and subpart, if applicable) of the Interrogatory requesting the identification and the page count or description of the document or item. Additionally, to the extent known, the listing shall include the author, publisher, title, date, and any “Bates” or other sequential production numbering for the document or item. When responding to the Request for Production, please produce copies of all documents, other items, information or materials that were identified in response to a request or directive to “identify for disclosure” in MCI’s Interrogatories. For each document or other item, please identify by number (including subpart, if any) the interrogatory which caused the “identification for disclosure”.

Please produce the requested information at the most granular level you possess. If a Interrogatory seeks information at a level more granular than what you possess, please do not object or decline to answer or produce on that basis, but rather, state that you do not possess information at that level and produce the information requested at the most granular level that

you possess. MCI is not asking for the creation of brand new data, but is seeking all available data for the specific categories and sub-categories described.

Please produce all information requested on any table by filling in the table provided in these Interrogatories. If additional explanation is required, please copy the question and provide your response below.

As used in these requests, the singular shall also be treated as plural and vice-versa. If you are unable to respond fully and completely to a document request, you shall explain the reasons why you are unable to do so. The terms defined above and the individual requests for information should be construed broadly to the fullest extent of their meaning in a good faith effort to comply with all applicable rules, including without limitation the Procedural Rules of the South Carolina Public Service Commission.

This request is directed to all documents and information in your custody or control. A document is deemed to be in your custody or control if you have possession of the document, have the right to secure such document or communication from another person having possession thereof, or the document or communication is reasonably available to you (including those documents or communications in the custody or control of your company's present employees, attorneys, agents, or other persons acting on its behalf and its affiliates. In response to requests for production of documents contained in these Interrogatories, you shall produce the document, including all appendices, exhibits, schedules, and attachments, that is most relevant to the request.

If you are unable to produce a document or information based on a claim that the document is not in your custody or control, state the whereabouts of such document or

information when it was last in your possession, custody or control, and provide a detailed description of the reason the document is no longer in your possession, custody or control, and the manner in which it was removed from your possession, custody or control.

These Interrogatories are continuing in nature, and should there be a change in circumstances which would modify or change an answer supplied by your company, then in such case, you should change or modify such answer and submit such changes answer as a supplement to the original answer. Further, should a subsequent version(s) of a document have been created or exist as of the date of this Interrogatory, such version(s) must be produced. Where prior versions or drafts of documents exist, please produce all such documents in your possession, custody or control.

MCI requests that you answer these Interrogatories under oath or stipulate in writing that its Interrogatories responses can be treated exactly as if they were filed under oath.

If you claim a privilege, or otherwise decline to produce or provide, any document or information responsive to one or more of the following categories, in addition to, and not in lieu of, any procedure that you must follow under law to preserve your objection(s) and/or privilege(s), within thirty (30) days after receiving these Interrogatories, the attorney asserting the privilege shall:

- a. identify in the objection to the request for information, or sub-part thereof, detailed reasons for your claim of privilege or other basis for protecting the

document or information from disclosure; and the nature of the privilege (including work product) that is being claimed; and

- b. provide the following information in the objection, unless divulgence of such information would cause disclosure of the allegedly privileged information:

(i) for documents: (1) the type of document; (2) subject matter of the document; (3) the date of the document; (4) the number of pages in the document; (5) the location or custodian of the document; (6) such other information as is sufficient to identify the document for a subpoena *duces tecum*, including, where available, the names(s), address(es) and telephone number of the author(s) of the document and all recipient(s), and, where not apparent, the relationship of the author and addressee to each other;

(ii) for oral communications: (1) the name(s), address(es) and phone number(s) of the person making the communication and the name(s), address(es) and phone number(s) of the persons present while the communication was made; (2) the relationship of the person(s) present to the person(s) making the communication; (3) the date and place of each communication; (4) the general subject matter of the communication.

In the event that any requested information is considered by you to be confidential, the attorney asserting such confidential status shall inform MCI of this designation as soon as he or she becomes aware of it, but in any event, prior to the time the responses to the

Interrogatories are due to discuss or negotiate a compromise. However, the confidential documents should be produced pursuant to the protective order(s) and/or non-disclosure agreement(s) executed in this proceeding.

Answers to these requests for information are to be provided within thirty (30) days after receiving these requests, on December 24, 2003. Any request for information received by you prior to 5 p.m. EST shall be deemed received on the date of service. Service of responses, and all notifications, shall be made in person or by facsimile or email to:

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DEFINITIONS

1. The term “analog” refers to electrical signals representing sound or data which are transmitted in a linear, non-digital format.
2. The terms “batch cut” and “batch hot cut” refer to a process by which the incumbent LEC simultaneously migrates two or more loops from one carrier’s local circuit switch to another carrier’s local circuit switch.
3. The term “bundled service” refers to a package offering to an end user customer that includes at least two different services for a single, usually discounted price, whether flat-rate or charged on a per unit basis. An example would be the offering of local and long distance service to an end user customer for a price that is less than the standard retail charges that would be assessed for each service individually.
4. The term “business end user” refers to an end user customer entity that purchases voice or data services, typically supported on multiple loops, to support a commercial enterprise. To the extent that your own tariff and/or business practices define this term differently, please use this definition in your response.
5. The acronym “CLEC” refers to competitive local exchange carriers.
6. The acronym “CLLI” refers to common language location identifier, an 11-character code generally comprised of numerals and letters that provides a unique identifier for circuit switches used by ILECs and CLECs.
7. The acronym “CO” refers to central office, the single physical ILEC building that houses one or more Class 5/end office ILEC switch(es), and in which end user customers’ loops are cross connected to ILEC switching equipment or CLEC collocation arrangements.
8. The term “communication” includes, without limitation of its generality, correspondence, email, statements, agreements, contracts, reports, white papers, users guides, job aids, discussions, conversations, speeches, meetings, remarks, questions, answers, panel discussions and symposia, whether written or oral. The term includes, without limitation of its generality, both communications and statements which are face-to-face and those which are transmitted by documents or by media such as intercoms, telephones, television, radio, electronic mail or the Internet.
9. The terms “cost study,” “cost studies,” “cost model” and “cost analyses” means the detailed development of a rate element or of rate elements through a methodology based upon engineering, operational, economic, accounting, or financial inputs, plus support for the sources of the inputs or support for the derivations of the inputs, that enables a person

using the study, studies, model or analyses to start with the support for each input and to then trace the support to the input, and to then be able to trace the input through the methodology to the resulting cost and then to the resulting rate element.

10. The term “cross connect” refers to an optical cable or copper cable that connects a CLEC’s collocation arrangement to the ILEC MDF.
11. The term “customer location” refers to a building or set of connected, contiguous, or adjacent buildings in a common area, used by residential, commercial, and/or governmental customers that share a primary street address or group of street addresses. It includes multi-unit residential, commercial, and/or governmental premises.
12. The term “customer premises” refers to the physical point at which the end user customer assumes responsibility for telecommunications wiring (i.e., the network interface device (“NID”) for single unit dwellings, and the individual point of demarcation at the end user customer’s unit for multi-unit buildings such as office buildings and apartment buildings).
13. The term “digital” refers to electrical or optical signals representing sound or data which are transmitted in a binary, discontinuous, non-linear format.
14. The term “document,” as used herein, shall have the same meaning and scope as contained in Rule 34 of the Federal Rules of Civil Procedure, and shall include, without limitation, all written, reported, recorded, magnetic, graphic, photographic matter, however produced or reproduced, which is now, or was at any time, in the possession, custody, or control of your company and its affiliates including, but not limited to, all reports, memoranda, notes (including reports, memoranda, notes of telephone, email or oral conversations and conferences), financial reports, data records, letters, envelopes, telegrams, messages, electronic mail (e-mail), studies, analyses, books, articles, magazines, newspapers, booklets, circulars, bulletins, notices, instructions, accounts, pamphlets, pictures, films, maps, work papers, arithmetical computations, minutes of all communications of any type (including inter- and intra-office communications), purchase orders, invoices, statements of account, questionnaires, surveys, graphs, recordings, video or audio tapes, punch cards, magnetic tapes, discs, data cells, drums, printouts, records of any sort of meeting, invoices, diaries, and other data compilations from which information can be obtained, including drafts of the foregoing items and copies or reproductions of the foregoing upon which notations and writings have been made which do not appear on the originals.
15. The term “DS-0” refers to a digital signal at level zero capable of transmitting at 64 kilobits per second.
16. The term “DS-0/voice grade” includes all circuits normally used for the provision of a service to transmit human voice alone. In particular, it includes analog circuits and

digital circuits capable of transmitting at levels greater than 2400 baud, up to and including 64 kilobits per second.

17. The term "DS-1" refers to Digital Signal Level 1, which has a transport speed of 1.544Mbps, and can be either unchannelized or channelized into 24 voice grade channels.
18. The term "hot cut" refers to an individual coordinated simultaneous transfer of DS-0/voice grade loops with live customers' service transferred.
19. The term "identify" or "identifying" means:
 - (a) When used in reference to natural persons: (1) full name; (2) last known address and telephone number; (3) whether the person is currently employed by, associated or affiliated with SWBT; (4) that person's current or former position; and (5) dates of employment, association or affiliation.
 - (b) When used in reference to a document: (1) its author; (2) actual or intended recipient(s); (3) date of creation; and (4) brief description of its contents.
 - (c) When used in reference to a communication: (1) whether the communication was oral or written; (2) the identity of the communicator; (3) the person receiving the communication; and (4) the location of the communicator and the person receiving the information, if the communication was oral.
20. The acronym "IDF" refers to intermediate distribution frame, a physical frame located between an MDF and an ILEC switch in a central office or wire center over which end user customer loops are transited for connection to the ILEC switch.
21. The term "ILEC" refers to incumbent local exchange carrier, and includes ILEC's parent or any subsidiary or affiliate and all current or former officers, directors, employees, agents, representatives, contractors or consultants of ILEC, as well as any persons or other entities who have acted or purported to act on its behalf.
22. The term "LATA" means "Local Access and Transport Area" as that term is defined in the *Modification of Final Judgement, United States v. Western Elec. Co.*, 552F. Supp. 131 (D.D.C. 1982), *aff'd sub nom., Maryland v. United States*, 460 U.S. 1001 (1983).
23. The term "MSA" refers to the Metropolitan Statistical Area as defined by the US Census Bureau and the Office of Management and Budget.
24. The term "qualifying service" refers to all telecommunications services, whether voice or data, and whether analog or digital that have ever been offered or provided by an ILEC pursuant to tariff or an interconnection agreement.

25. The acronym “MDF” refers to main distribution frame, a physical frame located in a central office or wire center that connects loops coming from an end user customer premises to an ILEC switch located in the central office or wire center.
26. “Relate, mention, reference, or pertain” shall be used to mean documents or communications containing, showing, relating, mentioning, referring or pertaining in any way, directly, or indirectly to, or in legal, logical or factual way connection with, a document request, and includes documents underlying, supporting, now or previously attached or appended to, or used in the preparation of any document called for by such request.
27. The term “residential end user” refers to an end user customer, typically an individual or family, who purchases voice or data services at his, her or their place of residence, or household. To the extent that your own tariff and/or business practices define this term differently, please use this definition in your response.
28. The term “Telcordia” refers to Telcordia Technologies, Inc. and its parent(s), current and former affiliates or subsidiaries, and all current or former officers, directors, employees, agents, representatives, contractors or consultants, as well as any persons or other entities who have acted or purported to act on its behalf.
29. The term “wire center” is synonymous with the term “central office,” and refers to the single physical building that houses one or more Class 5/end office ILEC switch(es) and in which end user customer’s loops are cross connected to the Class 5/end office ILEC switch(es).
30. The terms “you,” “your,” “yours”, or “your company” means the carrier or other business entity or proprietorship receiving these Interrogatories, including all affiliates, subsidiaries, officers, agents, attorneys, employees, representatives, agents, and consultants.

INTERROGATORIES

UNE TRANSPORT IMPAIRMENT ISSUES

MCI-1 Please list each and every transport route which you contend should be removed from the list of available DS-1 UNEs pursuant to FCC Rules §51.319(e)(1)(ii) [existence of competitive wholesale facilities.] For each listed route, please list: a) the CLLI code

identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

MCI-2 For each alternative competitive provider listed in your response to MCI-1, indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-3 For each route listed in your response to MCI-1, please provide the following information:

- a) The type of terminating facility (e.g., collocation) used at each end of the route and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider’s ownership/occupancy rights (i.e., “fee simple ownership”, “IRU”, etc.), and the identity of any underlying owners or interest holders in the facility.
- c) Identify for disclosure any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS1 transport along the particular route.
- d) The terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

MCI-4 Please list each and every transport route which you contend should be removed from the list of available DS-3 UNEs pursuant to FCC Rules §51.319(e)(2)(i)(A) [existence of alternative self-provisioned facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

MCI-5 For each alternative competitive provider listed in your response to MCI-4, indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-6 For each route listed in your response to MCI-4, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative

- competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "TRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Identify for disclosure any and all documents you have that state that each claimed alternative competitive provider is operationally ready to use the listed transport facilities to provide dedicated DS-3 transport along the particular route.

MCI-7 Please list each and every transport route which you contend should be removed from the list of available DS-3 UNEs pursuant to FCC Rules §51.319(e)(2)(i)(B) [existence of competitive wholesale facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

MCI-8 For each alternative competitive provider listed in your response to MCI-7, indicate whether it is an "affiliate" (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-9 For each route listed in your response to MCI-7, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider's ownership/occupancy rights (i.e., "fee simple ownership", "TRU", etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Identify for disclosure any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS-3 transport along the particular route.
- (d) The terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

MCI-10 Please list each and every transport route which you contend should be removed from the list of available DS-3 UNEs pursuant to FCC Rules §51.319(e)(2)(ii) [potential deployment of alternative facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of any identified alternative competitive provider.

MCI-11 For each route listed in your response to MCI-10, please identify for disclosure all information in your possession relating to:

- (a) local engineering costs of building and utilizing transmission facilities
- (b) the cost of underground or aerial laying of fiber or copper;
- (c) the cost of equipment needed for transmission; installation and other necessary costs involved in setting up service;
- (d) relevant local topography such as hills and rivers;
- (e) availability of reasonable access to rights-of-way;
- (f) availability/feasibility of similar quality/reliability alternative transmission technologies along the particular route;
- (g) customer density and addressable market; and
- (h) existing facilities-based competition.

MCI-12 For each alternative competitive provider listed in your response to MCI-10 and for each provider of any existing facilities-based competition listed in your response to MCI-11(h), indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-13 Please list each and every transport route which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §51.319(e)(3)(i)(A) [existence of alternative self-provisioned facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

MCI-14 For each alternative competitive provider listed in your response to MCI-13, indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-15 For each route listed in your response to MCI-13, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement).
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider’s ownership/occupancy rights (i.e., “fee simple ownership”, “IRU”, etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Identify for disclosure any and all documents you have that state that each claimed alternative competitive provider is operationally ready to use the listed transport facilities to provide dedicated Dark Fiber transport along the particular route.

MCI-16 Please list each and every transport route which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §51.319(e)(3)(i)(B) [existence of competitive wholesale facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of each claimed alternative competitive provider.

MCI-17 For each alternative competitive provider listed in your response to MCI-16, indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-18 . BellSouth For each route listed in your response to MCI-16, please provide the following information:

- (a) The type of terminating facility (i.e., collocation) used at each end and a copy of the authority by which that facility is governed (i.e., tariff pages, collocation contract, or interconnection agreement.)
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider’s ownership/occupancy rights (i.e., “fee simple ownership”, “IRU”, etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Identify for disclosure any and all documents you have that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated Dark Fiber transport along the particular route.
- (d) The terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

MCI-19 Please list each and every transport route which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §51.319(e)(3)(ii) [potential deployment of alternative facilities.] For each listed route, please list: a) the CLLI code identifications of the endpoints; b) the identities of any identified alternative competitive provider.

MCI-20 For each route listed in your response to MCI-19, please identify for disclosure all information in your possession relating to:

- (a) local engineering costs of building and utilizing transmission facilities;
- (b) the cost of underground or aerial laying of fiber or copper;
- (c) the cost of equipment needed for transmission; installation and other necessary costs involved in setting up service;
- (d) relevant local topography such as hills and rivers;

- (e) availability of reasonable access to rights-of-way;
- (f) availability/feasibility of similar quality/reliability alternative transmission technologies along the particular route;
- (g) customer density and addressable market; and
- (h) existing facilities-based competition.

MCI-21 For each alternative competitive provider listed in your response to MCI-19 and for each provider of any existing facilities-based competition listed in your response to MCI-20(h), indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-22 Please describe and identify for disclosure all supporting documents for any state or locally enacted or enforced barriers to entry by competing providers of DS-1, DS-3, OC-n, or Dark Fiber transport, including, but not limited to, any moratoria or restrictions on construction or access to rights of way. Include all relevant legal provisions and a description of any BellSouth deployment or construction projects which have been undertaken since the enactment of the restriction or moratoria. Describe the steps taken or qualifications met in order for the identified BellSouth projects to either comply with or avoid the effects of the restriction or moratoria.

MCI-23 For each route identified in your responses to MCI-1 through MCI-19, please provide the following information, or identify it for disclosure:

- (a) All forecasts of BellSouth expected, estimated, anticipated, or forecasted demand growth or decline for all classes of transport service. To the extent you have information disaggregated by type of customer or demand (e.g., “business”, “data”, “UNE”, “special access”, or other categories) please provide such disaggregated figures. To the extent different documents may provide differing figures, estimates, or forecasts based upon the impact or implementation of any regulatory or judicial action (including, but not limited to, the *Triennial Review Order* and related proceedings) provide all such figures, estimates, and forecasts, identifying which relate to which different regulatory or judicial outcomes;
- (b) BellSouth’s current transport capacity utilization, including total number and type of fibers or copper cabling
- (c) number of “unlit” or “dark” fibers;
- (d) number of “lit” fibers with the current operational level implemented for each (i.e., which OC level);
- (e) current utilization of copper wire, if any, including identification and capacity of implemented digital and analog transmission capability
- (f) identification of unused copper facilities, if any.

MCI-24 Please provide the following information for each fiber or conduit deployment project by BellSouth in South Carolina since January 1, 2000:

- (a) type, size, and capacity of conduit installed along all or any separate portion of the route;
- (b) type and number of fibers initially installed along all or any separate portion of the route,
- (c) type and number of fibers for each and every subsequent installation along all or any portion of the route;
- (d) all available budgetary and actual cost data for both initial and any subsequent installations, including all costs for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project. Please identify all supporting documents for disclosure.

MCI-25 Please provide the following information for each planned fiber or conduit deployment project by BellSouth in South Carolina for the next 3 years: (Include in this response any current projects not included in T-111, as well as future projects.)

- (a) type, size, and capacity of conduit to be installed along all or any separate portion of the route;
- (b) type and number of fibers to be initially installed along all or any separate portion of the route,
- (c) type and number of fibers for each and every planned subsequent installation along all or any portion of the route;
- (d) all available budgetary cost data and estimates for both initial and any subsequent installations, including all costs and estimates for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project. Please identify all supporting documents for disclosure.

MCI-26 Please identify for disclosure all contracts, agreements, tariffs, or other governing documents by which BellSouth:

- (a) sells, rents, leases, or otherwise provides telecommunications transport services between its switches and/or wire centers to others in South Carolina;
- (b) buys, rents, leases, or otherwise acquires telecommunications transport services between its switches and/or wire centers from others in South Carolina.

- MCI-27 With respect to all documents identified in your response to MCI-26, please provide quarterly totals for the last 3 years of the amount of transport capacity provided or acquired, identifying the quantity, route, and opposite party for each segment.
- MCI-28 Please describe in detail any price floors or other limitation imposed by any law, regulation, South Carolina Public Service Commission orders or rulings that constrain BellSouth's ability to reduce prices for each of the following: a) dark fiber service, b) OC-n level service, c) DS-3 service and d) DS-1 service. For each such price floor or other limitation, provide the basis for the calculation for the price floor or other limitation (e.g., price freeze, cost-based calculation, etc.).
- MCI-29 Please provide a description and identify for disclosure all supporting documentation for all BellSouth currently offered bundles and volume discounts involving the following: a) dark fiber service, b) OC-n level service, c) DS-3 service and d) DS-1 service.
- MCI-30 Please provide a description and identify for disclosure all supporting documentation for all BellSouth planned or contemplated bundles and volume discounts involving the following: a) dark fiber service, b) OC-n level service, c) DS-3 service and d) DS-1 service.
- MCI-31 Please identify for disclosure all documents that address or assess the risk of stranded transport capacity on all or any portion of BellSouth's existing network in South Carolina.
- MCI-32 For this and the immediately following four questions, the phrase "lit enterprise circuit(s)" means one or more circuits at the DS-1, DS-3, or OC-x capacity levels. Please describe all your current procedures for moving portions of lit enterprise circuits from your own network to a CLEC or IXC network. Include all procedures for circuits which serve multiple end-users by virtue of connection to multiple BellSouth "tail circuits" or "loops" via BellSouth provided MUX or DACS equipment.
- MCI-33 When a lit enterprise circuit provided by BellSouth under UNE procedures or Special Access tariffs serves multiple end-user customers through BellSouth provided MUX or DACS equipment, will BellSouth perform a "hot cut" of all or part of the lit enterprise circuit portion to non-BellSouth provided transport?
- (a) If no, why not?
 - (b) If yes, will BellSouth perform this function based on a single Access Service Request ("ASR") submission by the carrier customer or does BellSouth require multiple ASRs? If the answer is that a single ASR is acceptable, please identify any prior periods when multiple ASRs were required.

MCI-34 As part of any required transition from UNE enterprise circuit transport to non-BellSouth transport, will BellSouth perform a “hot cut” of all or part of any lit enterprise circuit portion to non-BellSouth provided transport?

1. If no, why not?
2. If yes, will BellSouth perform this function based on a single service request, or will BellSouth require separate requests for each end-user circuit?

MCI-35 Has BellSouth ever imposed restrictions on the number of lit enterprise circuits it would transition from the BellSouth network to the networks of others? If yes, state all such restrictions imposed and all terms of such restrictions (i.e., any specifics as to numbers of such transitions within a specific time and/or region; conditions as to time “out of service”; any required impositions of unfavorable customer conditions; any mandatory classification of any such transition as “project work” [or other non-standard undertaking] thereby changing or avoiding any otherwise applicable service guarantees, performance standards, or terms ensuring quality of service, etc.)

MCI-36 Please identify for disclosure all internal methods & procedures, business rules, memoranda, communications, e-mail, reports, etc. which describe in any way issues related to the migration of lit enterprise circuits or circuit portions from the BellSouth network to any non-BellSouth network. In addition, if not already encompassed in the prior sentence, also identify for disclosure all such documents which discuss any potential means of discouraging such moves, or any complaints or comments received relating to procedures used to undertake such moves, or any refusals of such moves.

ENTERPRISE UNE LOOP IMPAIRMENT ISSUES

MCI-37 Please state the proportion of “unlit” or “dark” fiber in loop feeder and distribution plant a) for each of the last 5 years; b) currently; and c) all projections for the next 3 years.

MCI-38 Please state the “OCn” level at which fiber in the loop feeder and distribution plant has been, is being, or will be operated:

- (a) for each of the last 3 years;
- (b) currently; and
- (c) all projections for the next 3 years.

MCI-39 Please describe and supply supporting documentation for any change in the last three years, and any change currently in progress, in deployment plans or schedules which would tend to either a) lower or reduce the future transmission (“OCn”) level of any fiber in the loop feeder and/or distribution plant; b) reduce any expected, anticipated, or planned increases in the future transmission (“OCn”) level of any fiber in the loop feeder and/or distribution plant; c) increase the number of fibers used at any point in the loop feeder and/or distribution plant; or d) reduce the number of “unlit” fibers available for provision of “dark fiber” to others.

MCI-40 Please define “customer location” and “customer premises” in the context of enterprise UNE loop impairment analyses. Are these terms synonymous in your view? If not, please describe in detail your view of the differences in these terms with respect to DS-1, DS-3, and Dark Fiber UNE loops.

MCI-41 Please list each and every customer location which you contend should be removed from the list of available DS-1 UNE loop destinations pursuant to FCC Rules §51.319(a)(4)(ii) [existence of competitive wholesale facilities.] For each listed location, please list:

- (a) the CLLI code identification of the network endpoint;
- (b) the identities of each claimed alternative competitive provider;
- (c) the exact location of the customer endpoint;
- (d) all persons owning an interest in or controlling access to the customer location;
- (e) whether the location is a single-tenant or multi-tenant facility;
- (f) identify for disclosure all documents or information in your possession, custody, or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;
- (g) whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;

- (h) whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;
- (i) whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;
- (j) what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

MCI-42 For each alternative competitive provider listed in your response to MCI-41, indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-43 For each location listed in your response to MCI-41, please provide the following information:

- (a) The type of alternative loop provisioned and made available.
- (b) The exact location of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider’s ownership/occupancy rights (i.e., “fee simple ownership”, “IRU”, etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Identify for disclosure any and all documents in your possession, custody or control that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS1 loop facilities at the specified location.
- (d) The terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access to the facilities of the alternative competitive provider.

MCI-44 Please list each and every customer location which you contend should be removed from the list of available DS-3 UNE loop destinations pursuant to FCC Rules §51.319(a)(5)(i)(A) [existence of alternative self-provisioned facilities.] For each listed location, please list:

- (a) the CLLI code identifications of the network endpoint;
- (b) the identities of each claimed alternative competitive provider;
- (c) the exact location of the customer endpoint;
- (d) all persons owning an interest in or controlling access to the customer location;
- (e) whether the location is a single-tenant or multi-tenant facility;

- (f) identify for disclosure all documents or information in your possession, custody, or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;
- (g) whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;
- (h) whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;
- (i) whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;
- (j) what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

MCI-45 For each alternative competitive provider listed in your response to MCI-44, indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-46 For each location listed in your response to MCI-44, please provide the following information:

- (a) The type of alternative loop provisioned and made available.
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider’s ownership/occupancy rights (i.e., “fee simple ownership”, “IRU”, etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Identify for disclosure any and all documents in your possession, custody, or control that state that each claimed alternative competitive provider is operationally ready to use the listed loop facilities to provide dedicated DS-3 loop facilities at the specified location.

MCI-47 Please list each and every customer location which you contend should be removed from the list of available DS-3 UNE loop destinations pursuant to FCC Rules §51.319(a)(5)(i)(B) [existence of competitive wholesale facilities.] For each listed location, please list:

- (a) the CLLI code identification of the network endpoint;
- (b) the identities of each claimed alternative competitive provider;
- (c) the exact location of the customer endpoint;
- (d) all persons owning an interest in or controlling access to the customer location;

- (e) whether the location is a single-tenant or multi-tenant facility;
- (f) identify for disclosure all documents or information in your possession, custody, or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;
- (g) whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;
- (h) whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;
- (i) whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;
- (j) what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

MCI-48 For each alternative competitive provider listed in your response to MCI-47, indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-49 For each location listed in your response to MCI-47, please provide the following information:

- (a) The type alternative loop provisioned and made available.
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider’s ownership/occupancy rights (i.e., “fee simple ownership”, “IRU”, etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Identify for disclosure any and all documents in your possession, custody or control that state that each claimed alternative competitive provider is willing immediately to provide, on a widely available basis, dedicated DS-3 loop facilities at the specified location.
- (d) The terms, including identification for disclosure of any governing documents, by which requesting telecommunications carriers are able to obtain reasonable and nondiscriminatory access through cross connection to the facilities of the alternative competitive provider.

MCI-50 Please list each and every customer location which you contend should be removed from the list of available DS-3 UNE loop destinations pursuant to FCC Rules §51.319(a)(5)(ii) [potential deployment of alternative facilities.] For each listed location, please list:

- (a) the CLLI code identifications of the network endpoint;
- (b) the identities of any identified alternative competitive provider;

- (c) the exact location of the customer endpoint;
- (d) all persons owning an interest in or controlling access to the customer location;
- (e) whether the location is a single-tenant or multi-tenant facility;
- (f) identify for disclosure all documents or information in your possession, custody or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;
- (g) whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;
- (h) whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;
- (i) whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;
- (j) what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

MCI-51 For each location listed in your response to MCI-50, please identify for disclosure all documents and information in your possession, custody or control relating to:

- (a) local engineering costs of building and utilizing loop facilities;
- (b) the cost of underground or aerial laying of fiber or copper;
- (c) the cost of equipment needed for loop facilities; installation and other necessary costs involved in setting up service;
- (d) relevant local topography such as hills and rivers;
- (e) availability of reasonable access to rights-of-way;
- (f) availability/feasibility of similar quality/reliability alternative loop technologies along the particular route;
- (g) customer density and addressable market; and
- (h) existing facilities-based competition.

MCI-52 For each alternative competitive provider listed in your response to MCI-50 and for each provider of any existing facilities-based competition listed in your response to MCI-51(h), indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-53 Please list each and every customer location which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules §51.319(a)(6)(i) [existence of alternative self-provisioned facilities.] For each listed location, please list:

- (a) the CLLI code identifications of the network endpoint;
- (b) the identities of each claimed alternative competitive provider;
- (c) the exact location of the customer endpoint;
- (d) all persons owning an interest in or controlling access to the customer location;
- (e) whether the location is a single-tenant or multi-tenant facility;
- (f) identify for disclosure all documents or information in your possession, custody or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;
- (g) whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;
- (h) whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;
- (i) whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;
- (j) what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

MCI-54 For each alternative competitive provider listed in your response to MCI-53, indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-55 For each location listed in your response to MCI-53, please provide the following information:

- (a) The type of alternative loop provisioned and made available.
- (b) The exact route of each claimed alternative facility, including the owner of each facility segment, its date of installation and date of initial operation, the nature of the alternative competitive provider’s ownership/occupancy rights (i.e., “fee simple ownership”, “IRU”, etc.), and the identity of any underlying owners or interest holders in the facility.
- (c) Identify for disclosure any and all documents in your possession, custody or control that state that each claimed alternative competitive provider is operationally ready to use the listed loop facilities to provide dedicated Dark Fiber loop facilities at the specified location.

MCI-56 Please list each and every customer location which you contend should be removed from the list of available Dark Fiber UNEs pursuant to FCC Rules

§51.319(a)(6)(ii) [potential deployment of alternative facilities.] For each listed location, please list:

- (a) the CLLI code identifications of the network endpoint;
- (b) the identities of each claimed alternative competitive provider;
- (c) the exact location of the customer endpoint;
- (d) all persons owning an interest in or controlling access to the customer location;
- (e) whether the location is a single-tenant or multi-tenant facility;
- (f) identify for disclosure all documents or information in your possession, custody or control regarding any and all rights of access either you or any other telecommunications carrier may have within the location;
- (g) whether you claim ownership or control over any intra-building wire, fiber, cabling, or right of access;
- (h) whether you are willing to make available any intra-building wire, fiber, cabling or right of access you may have to other telecommunications carriers at no cost;
- (i) whether you are willing to make available any intra-building wire, fiber, cabling, or right of access you may have to other telecommunications carriers for consideration, including the amounts and all terms of that consideration;
- (j) what other means, if any, you are aware of that could be used by other telecommunications carriers to access tenants within the location.

MCI-57 For each location listed in your response to MCI-56, please identify for disclosure all documents and information in your possession, custody or control relating to:

- (a) local engineering costs of building and utilizing loop facilities;
- (b) the cost of underground or aerial laying of fiber or copper;
- (c) the cost of equipment needed for loop facilities; installation and other necessary costs involved in setting up service;
- (d) relevant local topography such as hills and rivers;
- (e) availability of reasonable access to rights-of-way;
- (f) availability/feasibility of similar quality/reliability alternative
- (g) loop technologies along the particular route;
- (h) customer density and addressable market; and
- (i) existing facilities-based competition.

MCI-58 For each alternative competitive provider listed in your response to MCI-56 and for each provider of any existing facilities-based competition listed in your response to MCI-57(h), indicate whether it is an “affiliate” (as defined in 47 USC §153(1)) of BellSouth or of any other listed alternative competitive provider.

MCI-59 Please describe and identify for disclosure all supporting documents for any state or locally enacted or enforced limitations on or barriers to entry by competing providers of DS-1, DS-3, OC-n, or Dark Fiber loop, including, but not limited to, any moratoria or restrictions on construction or access to rights of way. Include all relevant legal provisions and a description of any BellSouth deployment or construction projects which have been undertaken since the enactment of the restriction or moratoria. Describe the steps taken or qualifications met in order for the identified BellSouth projects to either comply with or avoid the effects of the restriction or moratoria.

MCI-60 For each location identified in your response to MCI-41 through MCI-56, please provide or identify for disclosure the following information:

- (a) All forecasts of BellSouth expected, estimated, anticipated, or forecasted demand growth or decline for all classes of loop facilities. To the extent you have information disaggregated by type of customer or demand (e.g., “business”, “data”, “UNE”, “special access”, or other categories) please provide such disaggregated figures. To the extent different documents may provide differing figures, estimates, or forecasts based upon the impact or implementation of any regulatory or judicial action (including, but not limited to, the *Triennial Review Order* and related proceedings) identify for disclosure all such documents and provide all such figures, estimates, and forecasts, identifying which relate to which different regulatory or judicial outcomes;
- (b) BellSouth’s current loop capacity utilization, including total number and type of fibers or copper cabling;
- (c) number of “unlit” or “dark” fibers;
- (d) number of “lit” fibers with the current transmission level implemented for each (i.e., which OCn level);
- (e) current utilization of copper wire, if any, including identification and capacity of implemented digital and analog loop capability
- (f) identification of unused copper facilities, if any.

MCI-61 Please provide and identify for disclosure all documents supporting the following information for each fiber or conduit deployment project by BellSouth in South Carolina since January 1, 2000:

- (a) type, size, and capacity of conduit installed along all or any separate portion of the route;
- (b) type and number of fibers initially installed along all or any separate portion of the route,
- (c) type and number of fibers for each and every subsequent installation along all or any portion of the route;

- (d) all available budgetary and actual cost data for both initial and any subsequent installations, including all costs for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project.

MCI-62 Please provide and identify for disclosure all documents supporting the following information for each planned fiber or conduit deployment project by BellSouth in South Carolina for the next 3 years: (Include in this response any current projects not included in MCI-61, as well as future projects.)

- (a) type, size, and capacity of conduit to be installed along all or any separate portion of the route;
- (b) type and number of fibers to be initially installed along all or any separate portion of the route,
- (c) type and number of fibers for each and every planned subsequent installation along all or any portion of the route;
- (d) all available budgetary cost data and estimates for both initial and any subsequent installations, including all costs and estimates for permits, authority, ROW, lobbying, public policy, excavation, trenching, boring, backfill, surface repair, remediation, vault construction, termination, payments-in-kind, related usage rights, materials (including conduit and cabling), and any other expenses necessary to the project.

MCI-63 Please identify for disclosure all contracts, agreements, tariffs, or other governing documents by which BellSouth:

- (a) sells, rents, leases, or otherwise provides telecommunications loop facilities to others in South Carolina;
- (b) buys, rents, leases, or otherwise acquires loop facilities from others in South Carolina.

MCI-64 With respect to all documents identified in your response to MCI-63, please provide quarterly totals since January 1, 2000 of the amount of loop capacity provided or acquired, identifying the quantity, route, and opposite party for each segment.

MCI-65 Please describe in detail any price floor(s) or other limitation(s) imposed by any law, regulation, South Carolina Public Service Commission orders or rulings that constrain BellSouth's ability to reduce prices for each of the following:

- (a) dark fiber loop service,
- (b) OC-n level loop service,

- (c) DS-3 loop service and
- (d) DS-1 loop service. For each such price floor or other limitation, provide the basis for the calculation for the price floor or other limitation (e.g., price freeze, cost-based calculation, etc.).

MCI-66 Please provide a description and identify for disclosure all documentation for all BellSouth currently offered bundles and volume discounts involving the following: a) dark fiber loop service, b) OC-n level loop service, c) DS-3 loop service and d) DS-1 loop service.

MCI-67 Please provide a description and identify for disclosure all supporting documentation for all BellSouth planned or contemplated bundles and volume discounts involving the following: a) dark fiber loop service, b) OC-n level loop service, c) DS-3 loop service and d) DS-1 loop service.

MCI-68 Please identify for disclosure all documents in your possession, custody or control that address or assess the risk of stranded loop capacity on all or any portion of BellSouth's existing network in South Carolina.

REQUESTS TO PRODUCE

MCI-69 Please provide all documents identified or referred to in your answers to the foregoing interrogatories.

By: _____

November _____, 2003.

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CERTIFICATE OF SERVICE

PERSONALLY APPEARED before me, Betty J. DeHart, who, being duly sworn, deposes and says that she is not a party to these proceedings and has no interest therein; that on the 21st day of November, 2003, she served by mail the Interrogatories and Requests to Produce of MCI WorldCom Communications, Inc., Intermedia Communications, Inc., and MCIMetro Access Transmission Services, LLC in the above entitled case upon all counsel of record by causing same to be deposited in an authorized United States Mail Box; that the envelopes containing said document were properly addressed, securely wrapped and sealed and bore the proper postage; and that said envelopes were addressed to the persons indicated below, and via electronic mail by sending copies of same via electronic mail to the email addresses indicated below.

F. David Butler, Esquire
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david.butler@psc.state.sc.us

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Betty J. DeHart

SWORN to before me this

_____ day of November, 2003.

_____(L.S.)
Notary Public for South Carolina
My Commission Expires: _____